

Oregon Public Utility Commission 201 High Street SE, Suite 100 Salem, OR 97301-3398

February 23, 2021

RE: Annual update to utility Community Solar Program bill credit rates

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

The Oregon Solar Energy Industries Association (OSEIA) and the Project Managers (PMs) it represents submit the following comments on staff's recommendations for the annual update to utility Community Solar Program bill credit rates.

OSEIA agrees with the staff recommendation to continue the 2020 bill credit rates until January 31, 2022, for the remainder of the interim capacity tier. While not surprising, due to the many difficulties in developing a community solar project, it is still discouraging to see that there are so few projects led by community organizations. OSEIA wholeheartedly agrees that lower bill credit rates would substantially harm the development of projects by community groups and would reduce bill savings for subscribers.

OSEIA also agrees with staff that the policy for credit rates should be consistent across all three utilities in order to avoid an additional layer of complexity, especially for non-profits with less experience and capacity in solar development.

Sincerely,

Angela Crowley-Koch Executive Director